

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TARGET CORP., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-3477 (AKH)

7-ELEVEN, INC., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-4442 (AKH)

**NOTICE OF NETWORK DEFENDANTS' MOTION FOR REVISED ORDER  
REGULATING PROCEEDINGS PROVIDING FOR SEPARATE TRIALS OR IN THE  
ALTERNATIVE, TO PRECLUDE UNDISCLOSED EXPERT TESTIMONY UNDER  
FEDERAL RULE OF CIVIL PROCEDURE 37**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of the Network Defendants' Motion for a Revised Order Regulating Proceedings Providing for Separate Trials or in the Alternative, to Preclude Undisclosed Expert Testimony Under Federal Rule of Civil Procedure 37, the accompanying Transmittal Declaration of Gregory J. Dubinsky dated May 21, 2025, and the Exhibits annexed thereto, the Network Defendants hereby respectfully move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by

the Court, for an order providing for separate trials with the *Target* trial scheduled first, or in the alternative, precluding undisclosed expert testimony pursuant to Federal Rule of Civil Procedure 37. The grounds for this motion are set forth in the accompanying Memorandum of Law.

Dated: May 21, 2025

Respectfully submitted,

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